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*Attorney for Secured Creditor*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

**In Re:**

**DESERT VALLEY STEAM CARPET  
CLEANING LLC,**

**Debtor.**

**Chapter 7**

**Case No. 4:17-bk-13309-SHG**

**NOTICE OF MOTION FOR RELIEF  
FROM AUTOMATIC STAY**

NOTICE IS HEREBY GIVEN that on the 13<sup>th</sup> day of November, 2017 that Atlas Residential, LLC, an Arizona Limited Liability Company ("Atlas"), by and through undersigned counsel, filed its Motion for Relief From The Automatic Stay, the details of which are as follows:

Movant asserts that it has cause to lift the Automatic Stay in that Respondent has been collecting rents and failed to make the mortgage payments, pay property taxes or provide proof of property insurance; that Respondent has no equity in the real property and there is no reasonable likelihood of reorganizing this Chapter 7 debt which are the subject of the Motion for Relief from Stay. Therefore, Movant is entitled to an Order Lifting Stay with respect to such property.

1 FURTHER NOTICE IS HEREBY GIVEN that pursuant to Local Bankruptcy Rule  
2 4001 if no objection is filed with the court and a copy served on Movant whose  
3 address is:

4 Atlas Residential, LLC  
5 c/o Cynthia L. Johnson, Esq.  
6 Law Office of Cynthia L. Johnson  
7 11640 E. Caron Street  
8 Scottsdale, AZ 85259  
[cynthia@jsk-law.com](mailto:cynthia@jsk-law.com)

9 WITHIN 14 DAYS of service of the motion, the motion for relief from the automatic  
10 stay may be granted without further hearing.

11 **RESPECTFULLY SUBMITTED** this 13<sup>th</sup> day of November, 2017.

12 **CYNTHIA L. JOHNSON**

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15 By: /s/ Cynthia L. Johnson

16 Cynthia L. Johnson  
Attorney for Movant

17 COPY of the foregoing mailed or served  
18 via (email or fax\* or electronic notification\*\* if so marked)  
19 this 13<sup>th</sup> day of November, 2017 to:

20 \*\*Office of the U.S. Trustee  
21 230 N. 1<sup>st</sup> Avenue  
22 Suite 204  
Phoenix, AZ 85003

23 \*\*Mr. Stanley J. Kartchner  
24 United States Trustee  
25 7090 N. Oracle Rd.  
26 Suite 178-204  
Tucson, AZ 85704  
Trustee

1 Desert Valley Steam Carpet Cleaning LLC  
2 108 E. 8<sup>th</sup> Street  
3 Eloy, AZ 85131  
4 Debtor

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By: /s/Cynthia Johnson